

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

MICHAEL DAVID SILLS and MARY  
SILLS,

Plaintiffs,

v.

SOUTHERN BAPTIST CONVENTION, a  
non-profit corporation;  
DR. ED LITTON, Individually, and as agent  
and/or employee of SOUTHERN BAPTIST  
CONVENTION;  
LIFE WAY CHRISTIAN RESOURCES OF  
THE SOUTHERN BAPTIST CONVENTION,  
a non-profit corporation;  
JENNIFER LYELL, Individually and as agent  
and/or employee of LIFEWAY CHRISTIAN  
RESOURCES OF THE SOUTHERN  
BAPTIST CONVENTION and SOUTHERN  
BAPTIST CONVENTION;  
ERIC GEIGER, Individually and as agent  
and/or employee of LIFEWAY CHRISTIAN  
RESOURCES OF THE SOUTHERN  
BAPTIST CONVENTION and SOUTHERN  
BAPTIST CONVENTION;  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION, a  
non-profit corporation;  
BART BARBER, Individually and as agent  
and/or employee of SOUTHERN BAPTIST  
CONVENTION;  
WILLIE MCLAURIN, Individually and as  
agent and/or employee of SOUTHERN  
BAPTIST CONVENTION and EXECUTIVE  
COMMITTEE OF THE SOUTHERN  
BAPTIST CONVENTION;  
ROLLAND SLADE, Individually and as agent  
and/or employee of SOUTHERN BAPTIST  
CONVENTION and EXECUTIVE  
COMMITTEE OF THE SOUTHERN  
BAPTIST CONVENTION;

Case No. 3:23-cv-00478  
Judge Campbell  
Magistrate Judge Frensley

THE SOUTHERN BAPTIST  
THEOLOGICAL SEMINARY, a non-profit  
corporation;  
DR. R. ALBERT MOHLER, Individually and  
as agent and/or employee of THE  
SOUTHERN BAPTIST THEOLOGICAL  
SEMINARY and SOUTHERN BAPTIST  
CONVENTION;  
SOLUTIONPOINT INTERNATIONAL, INC.,  
a corporation, individually and d/b/a  
GUIDEPOST SOLUTIONS; and  
GUIDEPOST SOLUTIONS, LLC, a limited  
liability corporation and agent of the Southern  
Baptist Convention,  
  
Defendants.

**MOTION OF DEFENDANTS SOLUTIONPOINT INTERNATIONAL, INC., AND  
GUIDEPOST SOLUTIONS LLC TO DISMISS PLAINTIFFS' COMPLAINT**

For the reasons set forth more fully in the accompanying Memorandum of Law, pursuant to Fed. R. Civ. P. 12(b)(1), Fed. R. Civ. P. 12(b)(2) and/or Fed. R. Civ. P. 12(b)(6), Defendants SolutionPoint International, Inc. ("SPI") and Guidepost Solutions LLC respectfully move to dismiss Plaintiffs' Complaint ("Complaint") for lack of subject matter jurisdiction, lack of personal jurisdiction (as to SPI) and/or for failure to state a claim upon which relief can be granted.

In further support of this Motion, the Declaration of Anthony M. Collura is filed contemporaneously herewith.

Respectfully submitted,

s/ John R. Jacobson

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via the ECF Court System on this 12th day of July, 2023 on the following:

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